

EDWARD STONE LAW

MEMO ENDORSED

March 3, 2021

VIA ECF

Honorable William H. Pauley III
United States District Judge
United States District Court
Southern District of New York
Daniel Patrick Moynihan Courthouse
500 Pearl Street
New York, New York 10007

Application granted. The final pre-trial telephonic conference is rescheduled from May 14, 2021 at 11:00 a.m. to May 4, 2021 at 2:00 p.m. The dial-in number for the conference is (888) 363-4749. The access code is 3070580.

Re: *Lori Gjenashaj, et al. v. City of New York, et al.*, 19 Civ. 4142 (WHP) (GWG)

Your Honor:

I am writing with consent from Defendants' counsel, Brachah Goykadosh, Senior Counsel in the Office of James E. Johnson, Corporation Counsel of the City of New York, to respectfully request that the Court reconsider the date of the final pre-trial conference in its most recent order dated March 2, 2021. I am not requesting any other changes to the Court's scheduling Order, as recently amended.

The reason for this request is that on May 14, 2021 I will be actively engaged in a series of all-day hearings in a matter that has been pending for quite some time in Portsmouth, Virginia. The Virginia case involves multiple parties and a member of the Virginia Legislature.

It would be extremely difficult for me to be available for our final pre-trial conference on May 14th as a number of motions and hearings are scheduled to last for the entire day. In my request, we had requested May 6th as the date for the final pre-trial conference as I was mindful of my conflict and travel scheduled around May 14th. I believe that this constitutes extraordinary cause under the circumstances and given that we are not requesting any other changes to Your Honor's Order, I do not believe that changing the date of the final status conference will cause undue delay or prejudice any party.

Plaintiff hereby respectfully requests that the Court extend the date of the final pre-trial conference from May 14, 2021 to any day that is convenient for the Court after April 29, 2021. The parties have conferred, and the following dates are available any time on the following dates: May 3, 2021 May 4, 2021, May 5, 2021, and May 20, 2021. The parties would also be available for a conference any time before noon on May 7, 2020 and May 21, 2020.

Thank you for your consideration.

Respectfully submitted,



Edward S. Stone

Dated: March 3, 2021
New York, New York

SO ORDERED:



WILLIAM H. PAULEY III
U.S.D.J.

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